

*ELECTRONICALLY FILED*

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF KENTUCKY  
LEXINGTON DIVISION  
CIVIL ACTION NO. 5:17-cv-477-DCR

UNITED STATES OF AMERICA

PLAINTIFF

v.

**ANSWER OF KENTUCKY HOUSING CORPORATION**

GREGORY DALE RHINEHEIMER, JR.  
AKA GREGORY DALE RHINEHEIMER  
AKA GREGORY RHINEHEIMER, ET AL.

DEFENDANTS

\*\* \*\* \* \* \* \* \*

Comes the Defendant, Kentucky Housing Corporation (hereinafter "KHC"), by counsel and for its Answer to the Plaintiff's Complaint herein states as follows:

1. KHC is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraphs 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 18, 19 and 20 of the Complaint, and therefore denies same; however, Defendant does not deny matters accurately and properly reflected by public record.

2. KHC admits only so much of the allegations contained in paragraph 17 of the Complaint insofar as same state that Kentucky Housing Corporation may be claiming an interest in the real property that is the subject of the Complaint because of the Mortgage filed of record in Mortgage Book 1115, Page 440, in the Office of the Clerk of Jessamine County, Kentucky.

3. Any allegations not expressly admitted herein are hereby denied.

4. KHC affirmatively pleads that its Mortgage on the real property that is the subject of this Action constitute a valid and enforceable lien with priority as determined by the real estate records of Jessamine County, Kentucky.

5. KHC affirmatively reserves the right, including as necessary the right to amend its answer and response to this action, to assert and/or bring any claims that it may have on the underlying obligations owed to it which are secured by its Mortgage lien, against Defendants, Gregory Dale Rhineheimer, Jr., and any other individuals who are obligated for the payment of same.

**WHEREFORE**, the KHC demands:

1. That KHC be adjudged to have a valid and enforceable Mortgage lien on real property that is the subject of the Complaint with a priority as determined by the real estate records of the Office of the County Clerk of Jessamine, Kentucky.

2. That KHC be adjudged to have reserved the right to assert and/or bring any claims that it may have on the underlying obligations owed to it which are secured by its Mortgage lien, against Defendants, Gregory Dale Rhineheimer, Jr., and any other individuals who are obligated for the payment of same, including any necessary amendments to its answer and/or response to this action.

3. For its costs herein expended, including reasonable attorney fees.

4. For any and all proper relief to which it may now or hereafter appear entitled.

/s/STEPHEN R. SOLOMON  
GOLDBERG SIMPSON, LLC  
STEPHEN R. SOLOMON  
MEGAN P. KEANE  
9301 Dayflower Street  
Prospect, Kentucky 40059  
Phone: (502) 585-8551  
Fax: (502) 581-1344  
*Counsel for Kentucky Housing Corporation*  
[ssolomon@goldbergsimpson.com](mailto:ssolomon@goldbergsimpson.com)  
[kyoung@goldbergsimpson.com](mailto:kyoung@goldbergsimpson.com)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served by United States mail, sufficient postage prepaid, this \_\_ day of December, 2017, upon the following:

George Mason Law Firm, PSC  
3070 Lakecrest Circle, Ste 440  
Lexington, Kentucky 40513.  
*Counsel for Plaintiff*

Gregory Dale Rhineheimer, Jr.  
Unknown Spouse of Gregory Dale Rhineheimer, Jr. if any  
313 Karen Drive  
Nicholasville, Kentucky 40356

Heather Nicole Rhineheimer  
201 Orchard Drive, Apt 34  
Nicholasville, Kentucky 40356

/s/STEPHEN R. SOLOMON  
STEPHEN R. SOLOMON